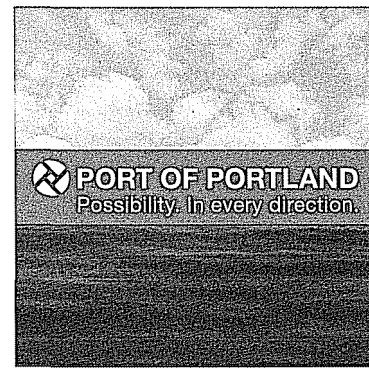


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July 11, 2008

Ms. Jennifer Sutter
Oregon Department of Environmental Quality
2020 SW Fourth Avenue, Suite 400
Portland, OR 97201-4987

**Subject: Swan Island Upland Facility, Operable Unit 4
No Further Action Determination Request
ECSI No. 271**

Dear Ms. Sutter:

The Voluntary Agreement for Remedial Investigation, Source Control Measures, and Feasibility Study (Agreement) between the Port of Portland (Port) and Oregon Department of Environmental Quality (DEQ) for the Swan Island Upland Facility (SIUF) addresses three operable units. One of those operable units is Operable Unit (OU) 2, the 37 acres of uplands owned by the Port along the southwest side of N. Channel Avenue (Figure 1).

The Port has sold the northwest portion of OU2 to Shipyard Commerce, an affiliate of Cascade General, for a future shipyard expansion development project consisting of an industrial materials lay-down yard and rail spur. The subject property generally encompasses the area historically referred to as the main parking lot for the shipyard (Figure 2). As part of the sale, the Port and Shipyard Commerce agreed that the Port would continue to pursue a No Further Action determination in connection with any historical conditions associated with the property, except that after the stormwater management system connected to outfall WR-399 serving the sold property was cleaned out, sampled and analyzed, Cascade General would assume responsibility for completing any further stormwater system evaluation and stormwater remedial action under a June 27, 2008 amendment to its May 8, 2006 stormwater letter agreement with DEQ.

To facilitate the completion of any evaluation of historical conditions associated with the sold property and the redevelopment of the property, the Port has proposed and DEQ has agreed to create a new operable unit (i.e., Operable Unit 4) consisting of the property sold to Shipyard Commerce..

Operable Unit 4 Description

Operable Unit 4 (OU4) is a 7.83-acre parcel of property located southwest of N. Channel Avenue on Swan Island. It is bounded to the northeast by N. Channel Avenue, to the northwest by OU1, and to the southwest and southeast by OU2 (Figure 1). The parcel of property is relatively level and entirely paved with asphalt-concrete. There are currently no structures or buildings on OU4.

According to recent research and site reconnaissance performed by Ash Creek Associates, Inc. (ACA) on behalf of the Port, the main parking lot drains to a series of inlets that discharge

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through an 18-inch corrugated metal pipe to the Willamette River (ACA, 2008; Figure 2). The storm water outfall is designated as WR-399 by the City of Portland. This is the only known, active storm water outfall that is associated with OU4. As is discussed in ACA (2008), flow and dye testing was performed on the main parking lot drainage system. The testing results confirmed that eight inlets drain to the main storm line connected to outfall WR-399. The testing results also determined that an inlet/catch basin (type of feature not field verified), located near the northwest boundary of OU4 does not drain to WR-399; the point of discharge for this feature was not definitively determined but is believed to discharge from property currently comprising Cascade General's site that is being addressed by Cascade General under its May 8, 2006 stormwater letter agreement with DEQ.

ACA (2008) discusses an inactive outfall to the southwest of OU4 designated as CG-26. It is an 18-inch corrugated metal pipe located approximately 100 feet upstream from outfall WR-399. Outfall CG-26 is not currently connected to any structures on OU4, its former purpose is unknown, and any remaining issues associated with it are being handled by the Port as part of OU2 of the SIUF.

Operable Unit 4 Development and Operations History

The Remedial Investigation Work Plan (Bridgewater, 2000) and Supplemental Preliminary Assessment (Supplemental PA; ACA, 2006) for the SIUF discuss the development and operations history for the SIUF, including the area where OU4 is located (ACA, 2006). The development and operations history of OU4 was considered in 2000 during the scoping and implementation of the remedial investigation (RI), specifically in the identification of known and suspected sources and identification of data gaps.

Prior to the early 1920s, OU4 was undeveloped and was part of Swan Island. At that time, Swan Island was actually an island and the main channel of the Willamette River flowed along the east side of the island. In 1922 the Port purchased Swan Island and in 1923 initiated a project to facilitate river navigation by relocating the main channel to the west side of the island, by, in part, excavating a strip of the island so as to widen and deepen the channel. During the mid to late 1920s, the elevation of Swan Island was raised using fill material dredged from the Willamette River during the channel relocation. In 1927, a causeway was constructed to connect the upstream end of Swan Island to the east shoreline of the Willamette River, making a peninsula out of the island thus creating the Swan Island Lagoon.

In 1926, the Port began construction of the municipal airport on Swan Island. Airport construction was completed in 1931. The airport continued operating until 1941. As is illustrated in Figure 8 of the Supplemental PA (ACA, 2006), the only airport facilities located on OU4 were portions of a "paver takeoff runway" and a cinder runway.

In 1942, the United States Maritime Commission entered into an agreement with the Port to lease approximately 250 acres of Swan Island, including OU4. The United States had the island developed into a ship building facility. As Figures 9 and 10 in the Supplemental PA illustrate, all or part of four buildings were located on OU4, including the mold loft (Building #3), oxygen house (Building #5), machine shop (Building #9) and boiler erection building (Building #21). The mold loft was a 45,500 square foot, two-story building with rail service and loading dock that was used as a template layout area for shaping steel. The oxygen house was a small structure where oxygen was stored. The machine shop was a 37,000 square foot, one-story

structure with a concrete floor and spur track where tools and parts were machined. The boiler erection building was a two-story structure where vessel boilers were constructed. Most of the mold loft and machine shop were located on adjacent parcels of property to the north of OU4.

A potential area of concern for the portion of OU2 that is now within OU4 identified in the Supplemental PA was a former electrical substation (Substation R; Figure 3). A second former substation (Substation A) was located immediately adjacent to the boundary of OU4. Substation A contained 1 oil-immersed self-cooled transformer (OISC), 6 oil-filled circuit breakers, and 5 potheads; Substation A was removed in 1968. Substation R contained 1 OISC and 1 pothead; Substation R was removed in 1961. Recent sampling in these locations is discussed later in this document.

The War Assets Administration (WAA) was established in 1946, was transferred responsibility for the United States' Swan Island shipyard facilities, and became involved in their management. The WAA surrendered its shipyard lease and sold all the facilities to the Port in 1949. The property became the Swan Island Ship Repair Yard, later referred to as the Portland Shipyard (PSY).

Between 1950 and 1978, OU4 was primarily open, graded soil with railroad spurs used for material receiving and storage. The main parking lot was constructed in 1977. It has been used as a parking lot for shipyard workers since 1977. The only additional use was the temporary staging of new trucks and trailers by Daimler AG Trucks (formerly Freightliner LLC) on a portion of the parking lot under a lease from the Port.

OU4 Sampling Results

The area encompassing OU4 was not identified as an area of concern during the scoping of the RI based on: (1) a review of the development and operations history information that was available at the time the work plan was prepared and (2) analytical results for soil samples collected in 1998 as part of the sale of the PSY to Cascade General. The later Supplemental PA determined that a former electrical substation was the only potential area of concern at OU4.

This section summarizes the sampling that has been completed on or adjacent to OU4 including the following:

- 1998 soil sampling completed by the Port as part of the sale of the PSY to Cascade General;
- 2007 soil sampling by the Port as part of the investigation of former SIUF substations;
- 2008 storm water conveyance system cleanout and sampling completed by the Port; and
- 2008 soil and groundwater sampling completed by Shipyard Commerce to support its OU4 property acquisition and redevelopment.

1998 Soil Sampling

In 1998, prior to selling the PSY to Cascade General, the Port collected soil samples at a number of locations throughout the SIUF. Two of those locations (Borings 1 and 7) were on or adjacent to OU4 (Figure 3). Boring 1 was located near the western corner of OU4. Boring 7 was located in the center of OU4.

Samples were collected from two depth intervals at each location: 0 to 2 feet below ground surface (bgs) and just above the water table at 16- to 18-feet bgs. The samples were analyzed for metals (arsenic, cadmium, chromium, lead, mercury, silver, barium and selenium), heavy oil range hydrocarbons using Method 418.1 and polychlorinated biphenyls (PCBs). The laboratory analytical results were reported to DEQ in the 2000 RI/FS Work Plan for the PSY (Bridgewater, 2000).

Cadmium, mercury, silver and selenium were not detected in any of the 0 to 2 feet bgs or 16 to 18 feet bgs samples collected at Borings 1 and 7. Arsenic concentrations ranged from 1.6 to 2.71 mg/kg, below DEQ's default background concentration of 7 mg/kg for soil (DEQ, 2002). Chromium concentrations ranged from 9.44 to 13.6 mg/kg, below DEQ's default concentration of 42 mg/kg. Lead concentrations ranged from not detected to 11.6 mg/kg, below DEQ's default background concentration of 17 mg/kg. Barium concentrations ranged from 76.7 to 158 mg/kg; DEQ (2002) does not provide a default background concentration for barium.

Heavy oil range hydrocarbons were not detected in three of the four soil samples; they were only detected in the 0 to 2 feet bgs sample collected at Boring 7 at a concentration of 146 mg/kg.

No PCBs were detected in any of the soil samples at a detection limit of 50 ug/kg.

2007 Former Substation Sampling

ACA, on behalf of the Port, collected soil samples from two former substation locations (Substations A and R) formerly located on or adjacent to OU4 (ACA, 2007). Four surface soil samples were collected at the corners of a 30- by 30-foot grid at each former substation location. All of the soil samples were analyzed by the total petroleum hydrocarbons (TPH) identification method (NWTPH-HCID) and by EPA Method 8082 for PCBs. No TPH or PCBs were detected in any of the soil samples.

2008 Storm Water Cleanout and Sampling

A cleanout of the storm water conveyance system (on the Freightliner leasehold) was completed followed by a one-time storm water sampling event as part of the sale of OU4 to Shipyard Commerce. The storm water system on the portion of OU4 previously leased by Cascade General was cleaned out in the fall of 2007 by West Coast Marine Cleaning (under subcontract to Cascade General).

The DEQ issued a June 27, 2008 letter amending the Storm Water Agreement between DEQ and Cascade General. Cascade General will now have the responsibility for completing whatever work is necessary to obtain a no further action determination from DEQ regarding the

matter of any source control evaluation and remedial action regarding the storm water system serving OU4 (Outfall WR-399).

A representative composite sample was collected from the dry solids (removed from the storm water inlets) and submitted for chemical analysis. Following the cleanout of the conveyance system, a whole-water grab sample was collected directly from Outfall WR-399 during a representative storm event (on June 3, 2008). The storm event met the Storm Event Criteria and Selection outlined in the Joint Source Control Strategy (JSCS) (DEQ/EPA, 2005).

The solids and storm water sample were analyzed for TPH (as gasoline, diesel, and oil), PCBs, phthalates, polynuclear aromatic hydrocarbons (PAHs), tributyl tin (TBT), and metals (including aluminum, antimony, arsenic, cadmium, chromium, copper, lead, mercury, manganese, nickel, selenium, silver, and zinc). The sample results are presented in Tables A-1 through A-10 (Attachment A). The laboratory reports are included in Attachment C (CD-Rom – due to file sizes). Attachment D presents the analytical data in DEQ's "Data Reporting and Screening Table" (CD-Rom).

The analytical data were screened against the screening level values (SLVs) in the JSCS guidance document (DEQ/EPA 2005). The detected concentrations were low in both the solid and storm water samples. A few constituents, however, exceed the very conservative JSCS criteria.

2008 Soil and Groundwater Sampling

As part of pre-acquisition due diligence, URS Corporation completed a subsurface investigation (on behalf of Shipyard Commerce) to assess the potential for environmental impacts to soil and groundwater beneath OU4. A combination of shallow and deep borings were completed in May 2008 (Figure 3 from the URS report and boring logs; Attachment B). Four soil samples were collected from each deep boring (at 5, 50, 75, and 100 feet bgs) and three soil samples were collected from each shallow boring (at 5, soil water interface, and 40 feet bgs). A grab groundwater screening sample was also collected at the maximum depth of each boring using a temporary well screen.

The soil and groundwater samples were analyzed for TPH (as gasoline, diesel, and oil), PCBs, PAHs, TBT, volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs) and metals (including arsenic, barium, chromium, copper, lead, mercury, nickel, and zinc). The sample results are presented in Tables B-1 and B-2 (Attachment B). The laboratory reports are included in Attachment C.

The analytical data were screened against the following criteria.

- The SLVs in the JSCS guidance document (DEQ/EPA, 2005).
- DEQ Risk-Based Concentrations (RBCs) from the Risk-Based Decision Making for Remediation of Petroleum-Contaminated Sites guidance (DEQ, 2003) for the excavation worker, construction worker, and occupational scenarios.

Metals also occur naturally in soil; therefore, metals data on soil samples were also compared to typical background concentrations (DEQ, 2002).

Benzo(a)pyrene exceeds the construction worker exposure scenario for one sample (GP-06) collected between 5 and 10 feet bgs. The 90%UCL on the mean was calculated using EPA's ProUCL software and the recommended approach with the accompanying user manual. The output for samples collected between the surface and 20 feet bgs indicated that the exposure point concentration (EPC) was below the construction worker RBC.

A few constituents (PAHs and metals) exceed the screening levels in grab groundwater, but the concentrations are consistent with the analytical results (i.e., within the historical range of values) for groundwater samples from the monitoring wells at the SIUF. The only exceptions were chrome, copper, nickel, and zinc in the deep groundwater sample from GP-06. The grab groundwater samples were not filtered and the resulting concentrations in GP-06 suggest the presence of soil entrained in the sample.

No Further Action Request

Given the extensive site history information and the sampling results for OU4, the Port requests that DEQ issue a No Further Action determination for the soil and groundwater of OU4. The Port understands that any such NFA will not necessarily include a decision on the stormwater system serving the property and that any further evaluation thereof will be conducted by Cascade General under the June 27, 2008 letter amendment to Cascade's May 8, 2006 stormwater letter agreement with DEQ..

The Port recommends that an NFA determination be issued for OU4 soil and groundwater based on the following information summarized in this letter.

- The only potential area of concern identified for OU4 was a former electrical substation (Substation R). A thorough investigation of this area was completed and no TPH or PCBs were detected in any of the soil samples.
- Sampling was completed for a second former substation (Substation A) located immediately adjacent to the boundary to OU4. No TPH or PCBs were detected in any of the soil samples.
- Additional sampling was completed in connection with the property's sale and industrial redevelopment. The results indicate that the reported concentrations are acceptable for the applicable exposure pathways.

If you have any questions regarding these activities, please contact the undersigned at (503) 944-7323.

Sincerely,



Nicole LaFranchise
Environmental Project Manager

Figures: Figure 1 – Site Vicinity Plan
 Figure 2 – Operable Unit 4
 Figure 3 – Historical Sample Locations

Attachments: Attachment A – Port Storm Water System Cleanout Data Tables
 Attachment B – Cascade General Site Investigation Data Tables
 Attachment C – Laboratory Analytical Reports (CD-Rom)
 Attachment D – DEQ Data Reporting and Screening Tables (CD-Rom)
 Attachment E – Cascade DEQ June 27, 2008 Letter Amendment

References:

ACA, 2006. Supplemental Preliminary Assessment, Swan Island Upland Facility, prepared for the Port of Portland, December 2006.

ACA, 2007. Letter from M. Pickering/ACA and A. Spencer/ACA to N. LaFranchise/Port of Portland regarding former substation sampling results, dated July 24, 2007.

ACA, 2008. Technical memorandum from M. Pickering/ACA to N. LaFranchise/Port of Portland regarding outfalls, Swan Island Upland Facility – Operable Unit 2, dated February 13, 2008.

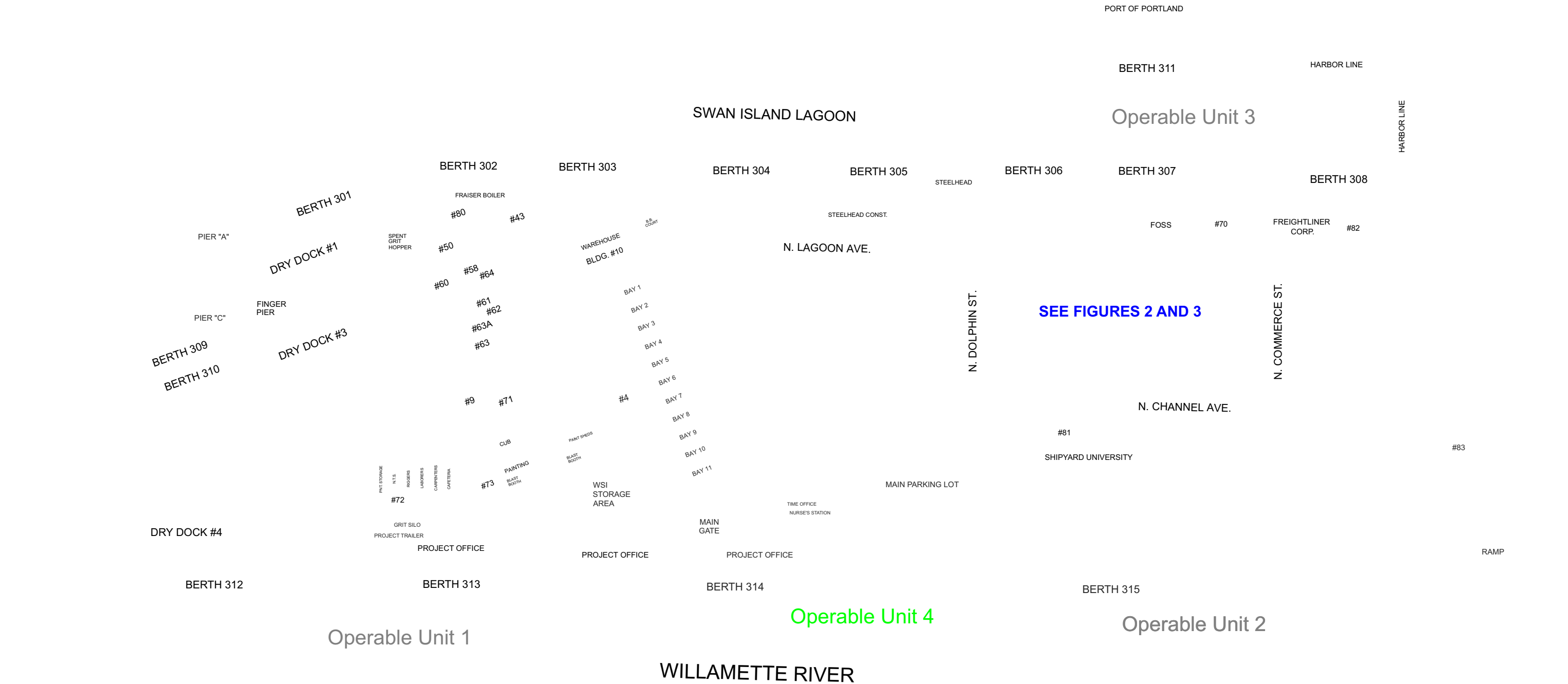
Bridgewater Group, 2000. Remedial Investigation/Feasibility Study Work Plan for the Portland Shipyard, prepared for the Port of Portland, November 2, 2000.

DEQ, 2002. Memo: The DEQ Toxicology Workgroup, Default Regional Background Concentrations for Metals. October 28, 2002.

DEQ, 2003. Risk-Based Decision Making for the Remediation of Petroleum-Contaminated Sites (RBC Spreadsheet updated July 4, 2007). September 22, 2003.

DEQ/EPA, 2005. Portland Harbor Joint Source Control Strategy – Final (Table 3-1 Updated July 16, 2007). December 2005.

c: Kristine Koch, EPA
 Alan Sprott, Vigor Industrial
 Barbara Jacobson, K&L Gates
 David Ashton, Port (w/o attachments)
 Suzanne Barthlemess, Port (w/o attachments)
 Richard Vincent, Port
 Michael Pickering, Ash Creek Associates (w/o attachments)
 Stu Brown, Bridgewater Group (w/o attachments)
 Mark Lewis, NewFields (w/o attachments)
 LWP File



- Legend:**
- Operable Unit 1 Boundary
 - Operable Unit 2 Boundary
 - Operable Unit 3 Boundary
 - Operable Unit 4 Boundary
 - Substation 4 Portland Shipyard Substation Location

0 400 800
Scale in Feet

Site Vicinity Plan

Swan Island Upland Facility
Portland, Oregon



Legend:

- WR-399
- Outfall Location and Designation
 - Catch Basin Location
 - Inlet Location
 - Manhole Location
 - Drain Location
 - STS Location and Flow Direction (Port of Portland)

0100200

Scale in Feet

Operable Unit 4

Swan Island Upland Facility
Portland, Oregon



Project Number 1115-11
July 2008

Figure
2

Legend:

Boring 1 Soil Boring Location (1998)

SUB A Kaiser Shipyard Substation Location - 1942 Plan (Locations Approximate) - Soil samples collected at North, South, East, and West corners



0 100 200

Scale in Feet

Historical Sample Locations

Swan Island Upland Facility
Portland, Oregon



Project Number 1115-11
July 2008

Figure
3

Attachment A

Port Storm Water System Cleanout Data Tables

Table A-1
Sediment Analytical Results: Metals
Swan Island Upland Facility - OU4
Portland, Oregon

Sample	Date Sampled	Aluminum	Antimony	Arsenic	Cadmium	Chromium	Copper	Lead	Manganese	Mercury	Nickel	Selenium	Silver	Zinc
		Concentration in mg/kg (ppm)												
Composite-050708	5/7/2008	9,780	1.68	15.6	0.752	27.5	207	87.4	424	0.035	23.3	0.5 B	0.436	550
MacDonald PECs and other SQVs		--	64	33	4.98	111	149	128	1,100	1.06	48.6	5	5	459
DEQ 2007 Bioaccumulative Sediment SLVs		--	--	7	1	--	--	17	--	0.07	--	2	--	--

Notes:

1. Metals analysis by EPA 6000/7000 Series Methods.
2. mg/kg (ppm) = milligrams per kilogram (parts per million)
3. Shading indicates that the reported concentration exceeds MacDonald PECs and other SQVs and/or DEQ 2007 Bioaccumulative Sediment SLV
4. -- = Not available.
5. B = The analyte was found in the associated method blank at a level that is significant relative to the sample result

Table A-2

Sediment Analytical Results: Total Petroleum Hydrocarbons

Swan Island Upland Facility - OU4

Portland, Oregon

Sample	Date Sampled	Gasoline-Range mg/kg (ppm)	Diesel-Range mg/kg (ppm)	Oil-Range mg/kg (ppm)
Composite-050708	5/7/2008	2.5 J	72	600

Notes:

1. Total petroleum hydrocarbons (TPH) as diesel and oil by Northwest Method NWTPH-Dx (with silica gel cleanup)
2. TPH as gasoline by Northwest Method NWTPH-Gx.
3. mg/kg (ppm) = milligrams per kilogram (parts per million)
4. J = The results is an estimated concentration that is less than the MRL (method reporting limit) but greater than or equal to the MRL/MDL (method detection limit)
5. H = The chromatographic fingerprint of the sample resembles a petroleum product, but the elution pattern indicates the presence of a greater amount of heavier molecular weight constituents than the calibration standard
6. O = The chromatographic fingerprint of the sample resembles an oil, but does not match the calibration standard

Table A-3
Sediment Analytical Results: Phthalates and TBT
Swan Island Upland Facility - OU4
Portland, Oregon

Sample	Date Sampled	Di-n-octyl Phthalate	Dimethyl Phthalate	Diethyl Phthalate	Di-n-butyl Phthalate	Benzyl Butyl Phthalate	Bis(2-ethylhexyl) Phthalate	TBT
		Concentrations in $\mu\text{g/kg}$ (ppb)						
Composite-050708	5/7/2008	<97	<97	<97	<200	340	<970	390
MacDonald PECs and other SQVs		--	--	600	100	--	800	--
DEQ 2007 Bioaccumulative Sediment SLVs		--	--	--	60	--	330	2.3

Notes:

1. Phthalates by EPA Method 8270-SIM.
2. $\mu\text{g/kg}$ (ppb) = micrograms per kilogram (part per billion)
3. Shading indicates that the MRL exceeds MacDonald PECs and other SQVs and/or DEQ 2007 Bioaccumulative Sediment SLV:
4. -- = Not available.
5. < = Not detected above the method reporting limit (MRL)
6. TBT = Tributyltin by the Krones Method.

Table A-4
Sediment Analytical Results: Polychlorinated Biphenyl Aroclors
Swan Island Upland Facility - OU4
Portland, Oregon

Sample	Date Sampled	Aroclor 1016	Aroclor 1221	Aroclor 1232	Aroclor 1242	Aroclor 1248	Aroclor 1254	Aroclor 1260	Aroclor 1262	Aroclor 1268	Total PCBs
		Concentrations in µg/kg (ppb)									
Composite-050708	5/7/2008	<10	<20	<10	<10	<10	21	20	<10	<10	41
MacDonald PECs and other SQVs		530	--	--	--	1,500	300	200	--	--	676
DEQ 2001 Bioaccumulative Sediment SLVs		--	--	--	--	--	--	--	--	--	0.39

Notes:

1. PCB Aroclors by EPA Method 8082
2. µg/kg (ppb) = micrograms per kilogram (part per billion)
3. Shading indicates that the reported concentration exceeds MacDonald PECs and other SQVs and/or DEQ 2007 Bioaccumulative Sediment SLV
4. -- = Not available.
5. Total PCBs is a summation of the detected aroclors.
6. < = Not detected above the method reporting limit (MRL)

Table A-5
Sediment Analytical Results: Polynuclear Aromatic Hydrocarbons
Swan Island Upland Facility - OU4
Portland, Oregon

Sample	Date Sampled	Naphthalene	2-Methylnaphthalene	Acenaphthylene	Acenaphthene	Fluorene	Dibenzofuran	Phenanthrene	Anthracene	Fluoranthene
		Concentrations in µg/kg (ppb)								
Composite-050708	5/7/2008	8	11	2.3 J	4.1 J	3.4 J	3.7 J	51	7	90
MacDonald PECs and other SQVs		561	200	200	300	536	--	1,170	845	2,230
DEQ 2007 Bioaccumulative Sediment SLVs		--	--	--	--	--	--	--	--	37,000

Sample	Date Sampled	Pyrene	Benzo(b)fluoranthene	Benzo(k)fluoranthene	Benz(a)anthracene	Chrysene	Benzo(a)pyrene	Indeno(1,2,3-cd)pyrene	Dibenz(a,h)anthracene	Benzo(g,h,i)perylene
		Concentrations in µg/kg (ppb)								
Composite-050708	5/7/2008	100	74	20	35	70	41	46	9.9	61
MacDonald PECs and other SQVs		1,520	--	13,000	1,050	1,290	1,450	100	1,300	300
DEQ 2007 Bioaccumulative Sediment SLVs		1,900	--	--	--	--	--	--	--	--

Notes:

1. Polynuclear Aromatic Hydrocarbons by EPA Method 8270 C SIM
2. µg/kg (ppb) = micrograms per kilogram (part per billion)
3. -- = Not available.
4. < = Not detected above the method reporting limit (MRL)
5. J = The results is an estimated concentration that is less than the MRL but greater than or equal to the MRL/MDL (method detection limit)

Table A-6
Storm Water Analytical Results: Total Metals
Swan Island Upland Facility - OU4
Portland, Oregon

Monitoring Location	Date Sampled	Aluminum	Antimony	Arsenic	Cadmium	Chromium	Copper	Lead	Manganese	Mercury	Nickel	Selenium	Silver	Zinc
		Concentrations in µg/L (ppb)												
WR-399	6/3/2008	141	0.642	1.42	0.224	0.91	36.1	2.98	76.3	<0.05	2.05	<0.5	0.022	168
Ecological Receptor Screening Level Values		87	1,600 ⁽³⁾	190 ^{(3), (4)}	0.094	11 ⁽⁵⁾	2.7	0.54	120 ⁽⁶⁾	0.012	16	5	0.12 ⁽³⁾	36
Portland Harbor specific fish consumption rate		--	64	0.014	--	--	--	--	10	0.0146	460	420	--	2,600

Notes:

1. Metals analysis by EPA 6000/7000 Series Methods.
2. Ecological Receptor Screening Level Values = EPA's 2004 NRWQC (chronic) presented where available, exceptions noted.
3. DEQ's 2007 AWQC (chronic).
4. Value for Arsenic III
5. Screening level for hexavalent chromium.
6. Oak Ridge National Laboratory Tier II Screening Level Value
7. < = Not detected above the method reporting limit (MRL)
8. µg/L (ppb) = micrograms per liter (part per billion)
9. Shading indicates that the reported concentration or MRL exceeds Ecological Receptor SLV and/or fish consumption rate
10. -- = Not available.
11. Portland Harbor specific fish consumption rate screening levels presented where available

Table A-7

Storm Water Analytical Results: Total Petroleum Hydrocarbons

Swan Island Upland Facility - OU4

Portland, Oregon

Monitoring Location	Date Sampled	Gasoline-Range µg/L (ppb)	Diesel-Range µg/L (ppb)	Oil-Range µg/L (ppb)
WR-399	6/3/2008	14 J	22 J	150 J

Notes:

1. Total petroleum hydrocarbons (TPH) as diesel and oil by Northwest Method NWTPH-Dx (with silica gel cleanup)
2. TPH as gasoline by Northwest Method NWTPH-Gx.
3. µg/L (ppm) = micrograms per liter (parts per billion)
4. J = The results is an estimated concentration that is less than the MRL (method reporting limit) but greater than or equal to the MRL/MDL (method detection limit)

Table A-8
Storm Water Analytical Results: Phthalates and TBT
Swan Island Upland Facility - OU4
Portland, Oregon

Monitoring Location	Date Sampled	Di-n-octyl Phthalate	Dimethyl Phthalate	Diethyl Phthalate	Di-n-butyl Phthalate	Benzyl Butyl Phthalate	Bis(2-ethylhexyl) Phthalate	TBT
		Concentrations in µg/L (ppb)						
WR-399	6/3/2008	<0.2	0.069 J	0.073 J	0.068 J	0.16 J	0.63	<0.05
Ecological Receptor Screening Level Values		3	3	3	3	3	3	0.072
Portland Harbor specific fish consumption rate		--	110,000	4,400	450	190	0.22	--

Notes:

1. Phthalates by EPA Method 525.2
2. µg/L (ppb) = micrograms per liter (part per billion)
3. Ecological Receptor Screening Level Values = DEQ's 2004 AWQC (chronic).
4. Portland Harbor specific fish consumption rate screening levels presented where available
5. < = Not detected above the method reporting limit (MRL)
6. Shading indicates that the reported concentration or MRL exceeds Ecological Receptor SLV and/or fish consumption rate
7. -- = Not available.

Table A-9

Storm Water Analytical Results: Polychlorinated Biphenyl Aroclors

Swan Island Upland Facility - OU4

Portland, Oregon

Monitoring Location	Date Sampled	Total PCBs	Aroclor 1016	Aroclor 1221	Aroclor 1232	Aroclor 1242	Aroclor 1248	Aroclor 1254	Aroclor 1260	Aroclor 1262	Aroclor 1268
			Concentrations in µg/L (ppb)								
WR-399	6/3/2008	Not Detected	<0.020	<0.040	<0.020 i	<0.020 i	<0.020 i	<0.020 i	<0.020 i	<0.020	<0.020
Ecological Receptor Screening Level Values		0.14	--	0.28	0.58	0.053	0.081	0.033	94	--	--
Portland Harbor specific fish consumption rate		0.0000064	--	--	--	--	--	--	--	--	--

Notes:

1. PCB Aroclors by EPA Method 8082
2. µg/L (ppb) = micrograms per liter (part per billion)
3. Ecological Receptor Screening Level Values = Oak Ridge National Laboratory's Tier II SCV presented where available
4. Portland Harbor specific fish consumption rate screening levels presented where available
5. Total PCBs is a summation of the detected aroclors.
6. i = The MRL (method reporting limit) / MDL (method detection limit) has been elevated due to a matrix interference
7. -- = Not available.

Table A-10
Storm Water Analytical Results: Polynuclear Aromatic Hydrocarbons
Swan Island Upland Facility - OU4
Portland, Oregon

Monitoring Location	Date Sampled	Naphthalene	2-Methylnaphthalene	Acenaphthylene	Acenaphthene	Dibenzofuran	Fluorene	Phenanthrene	Anthracene	Fluoranthene
		Concentrations in µg/L (ppb)								
WR-399	6/3/2008	0.013 J	0.0076 J	0.0043 J	<0.020	<0.020	0.0045 J	0.014 BJ	0.0063 J	0.016 J
Ecological Receptor Screening Level Values		620 ⁽³⁾	2.1 ⁽⁴⁾	--	520 ⁽³⁾	3.7 ⁽⁴⁾	3.9 ⁽⁴⁾	--	0.73 ⁽⁴⁾	--
Portland Harbor specific fish consumption rate		--	--	--	99	--	530	--	4,000	14

Monitoring Location	Date Sampled	Pyrene	Benz(a)anthracene	Chrysene	Benzo(b)fluoranthene	Benzo(k)fluoranthene	Benzo(a)pyrene	Indeno(1,2,3-cd)pyrene	Dibenz(a,h)anthracene	Benzo(g,h,i)perylene
		Concentrations in µg/L (ppb)								
WR-399	6/3/2008	0.026	<0.020 i	0.0077 J	0.0099 J	0.0029 J	0.0060 J	0.014 J	0.0071 J	0.021
Ecological Receptor Screening Level Values		--	0.027 ⁽⁴⁾	--	--	--	0.014 ⁽⁴⁾	--	--	--
Portland Harbor specific fish consumption rate		400	0.0018	0.0018	0.0018	0.0018	0.0018	0.0018	0.0018	--

Notes:

1. Polynuclear Aromatic Hydrocarbons by EPA Method 8270 C SIM
2. µg/L (ppb) = micrograms per liter (part per billion)
3. DEQ 2004 AWQC (chronic).
4. Oak Ridge National Laboratory's Tier II SCV.
5. J = The results is an estimated concentration that is less than the MRL but greater than or equal to the MRL/MDL (method detection limit)
6. < = Not detected above the method reporting limit (MRL)
7. Shading indicates that the reported concentration or MRL exceeds Ecological Receptor SLV and/or fish consumption rate
8. -- = Not available.

Attachment B

Cascade General Site Investigation Data Tables

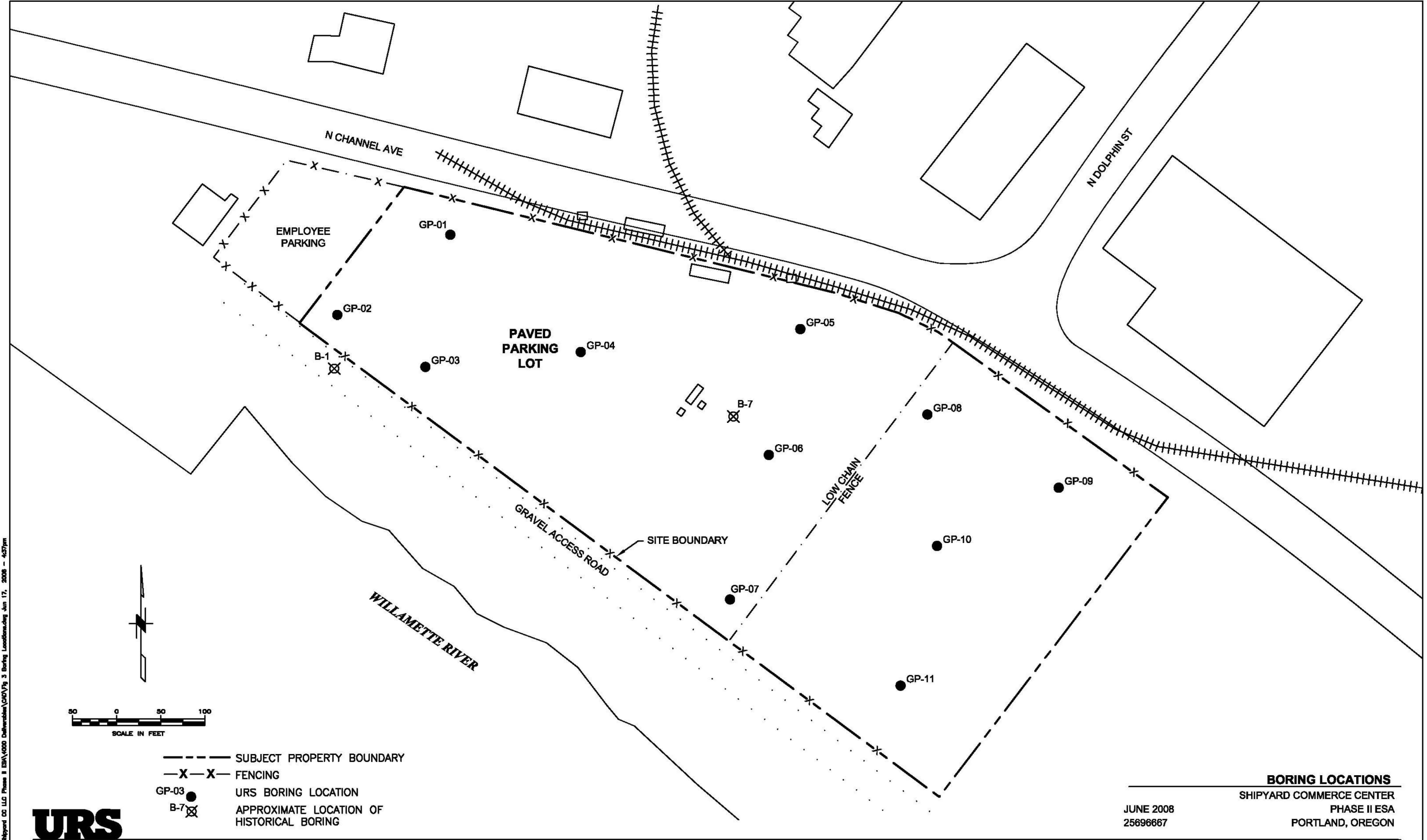
Table B-1. URS Soil Analytical Results
Shipyard Commerce Center Parking Lot Purchase (units = mg/kg)

					NWTPH-Dx ¹			SVOCs	PCBs	TBT Compounds			Detected PAHs per EPA 8270-SIM											Detected Priority Pollutant Metals							
	Location	Sample ID	Sample Depth (ft)	Date	Diesel Range	Heavy Oil Range	NWTPH-Gx Gasoline Range			Tributyltin	Dibutyltin	Butyltin	Anthracene	Benz(a)anthracene	Benzo(a)pyrene	Benzo(b)fluoranthene	Benzo(k)fluoranthene	Benzo(g,h,i)perylene	Chrysene	Fluoranthene	Indeno(1,2,3-cd)pyrene	Naphthalene	Phenanthrene	Pyrene	Arsenic	Barium	Chromium	Copper	Lead	Mercury	Nickel
URS Soil Results	GP-01	GP01-05-080523	4-8	23-May-08	21.8U	43.7U	3.78U	0.0036U	0.023	0.0075	0.0521U	0.135	0.237	0.332 ²		0.303	0.202	0.385	0.243	0.0521U	0.0779	0.536	2.19	-	9.52	10.6	2.27	0.0857U	11.6	30	
		GP01-20-080523	18-22	23-May-08	42.4U	84.9U	6.09U	0.0037U	0.0055U	0.0039U	0.0495U	0.0495U	0.0495U	0.0495U	0.0495U	0.0495U	0.0495U	0.0495U	0.0495U	0.0495U	0.0495U	0.0495U	0.0495U	3.61	-	19	20.3	3.81	0.563	22.3	55.6
		GP01-40-080523	36-40	23-May-08	29.2U	58.5U	4.82U	0.0037U	0.0055U	0.0039U	0.0428U	0.0428U	0.0428U	0.0428U	0.0428U	0.0428U	0.0428U	0.0428U	0.0428U	0.0428U	0.0428U	0.0428U	0.0428U	2.65	-	12.7	14	2.23	0.113U	15.4	37.7
	GP-02	GP02-5-080517	4-6	17-May-08	23.4U	46.9U	3.98U	0.0038U	0.0057U	0.0040U	0.0349U	0.0349U	0.0349U	0.0349U	0.0349U	0.0349U	0.0349U	0.0349U	0.0349U	0.0349U	0.0349U	0.0349U	0.0349U	1.71	-	12.7	11.5	1.94	0.0963U	15	38.5
		GP02-50-080517	50-52	17-May-08	38U	75.9U	5.08U	0.0037U	0.0055U	0.0039U	0.0488U	0.0488U	0.0488U	0.0488U	0.0488U	0.0488U	0.0488U	0.0488U	0.0488U	0.0488U	0.0488U	0.0488U	0.0488U	1.76	-	18.9	16.8	2.82	0.121U	21	50.1
		GP02-75-080517	73-75	17-May-08	28.3U	56.7U	4.83U	0.0038U	0.0057U	0.0040U	0.0431U	0.0431U	0.0431U	0.0431U	0.0431U	0.0431U	0.0431U	0.0431U	0.0431U	0.0431U	0.0431U	0.0431U	0.0431U	3.17	-	11.9	13.4	2.23	0.114U	17.8	40.6
		GP02-110-080517	108-110	17-May-08	35.1U	70.2U	4.86U	0.0038U	0.032	0.010	0.0458U	0.0458U	0.0458U	0.0458U	0.0458U	0.0458U	0.0458U	0.0458U	0.0458U	0.0458U	0.0458U	0.0458U	2.08	-	12.7	14.4	2.12	0.112U	18.8	41	
	GP-03	GP03-05-080523	4-8	23-May-08	35.8U	71.6U	4.94U	0.0036U	0.0054U	0.0038U	0.0466U	0.0466U	0.0466U	0.0466U	0.0466U	0.0466U	0.0466U	0.0466U	0.0466U	0.0466U	0.0466U	0.0466U	0.0466U	1.79	-	10.1	11.3	1.97	0.11U	13.1	36.8
		GP03-20-080523	18-22	23-May-08	38.9U	77.8U	5.29U	0.0037U	0.024	0.0062	0.0439U	0.0439U	0.0439U	0.0439U	0.0439U	0.0439U	0.0439U	0.0439U	0.0439U	0.0439U	0.0439U	0.0439U	0.0439U	2.82	-	19.5	18.1	3.35	0.109U	20.8	49.1
		GP03-40-080523	36-40	23-May-08	35.2U	70.3U	4.93U	0.0038U	0.0057U	0.0040U	0.0379U	0.0379U	0.0379U	0.0379U	0.0379U	0.0379U	0.0379U	0.0379U	0.0379U	0.0379U	0.0379U	0.0379U	0.0379U	3.24	-	11.8	13.8	1.99	0.122U	15.2	37.5
	GP-04	GP04-05-080522	4-8	22-May-08	32.8U	65.6U	4.63U	0.0038U	0.0058U	0.0041U	0.0724U	0.144	0.283	0.37 ²		0.255	0.231	0.471	0.227	0.0724U	0.246	0.684	3.94	-	14	14.3	2.48	0.096U	16.8	41.4	
		GP04-20-080522	18-22	22-May-08	30U	59.9U	4.61U	0.0038U	0.0072	0.0040U	0.0315U	0.0315U	0.0315U	0.0315U	0.0315U	0.0315U	0.0315U	0.0315U	0.0315U	0.0315U	0.0315U	0.0315U	0.0315U	2.79	-	17.7	15.2	3.26	0.106U	18.9	43.8
	GP-05	GP04-40-080522	36-40	22-May-08	37.4U	74.8U	4.86U	0.0038U	0.0086	0.0040U	0.0387U	0.0387U	0.0387U	0.0387U	0.0387U	0.0387U	0.0387U	0.0387U	0.0387U	0.0387U	0.0387U	0.0387U	0.0387U	1.82	-	17.9	15.4	2.7	0.115U	15.7	41.9
		GP05-05-080522	4-8	22-May-08	34U	67.9U	4.93U	0.0038U	0.0057U	0.0040U	0.0443U	0.0443U	0.0443U	0.0443U	0.0443U	0.0443U	0.0443U	0.0443U	0.0443U	0.0443U	0.0443U	0.0443U	0.0443U	2.04	-	12.7	13.3	2.2	0.111U	16	39
		GP05-20-080522	18-22	22-May-08	48.9U	97.8U	6.32U	0.0037U	0.038	0.0082	0.0448	0.0873	0.0803	0.0956 ²		0.0434U	0.0984	0.187	0.0434U	0.0434U	0.139	0.235	2.89	-	15.1	16.6	3.03	0.141U	20.9	49	
	GP-06	GP05-40-080522	36-40	22-May-08	32.8U	65.6U	4.19U	0.0037U	0.0088	0.0039U	0.0346U	0.0346U	0.0346U	0.0346U	0.0346U	0.0346U	0.0346U	0.0346U	0.0346U	0.0346U	0.0346U	0.0346U	0.0346U	1.59	-	10.1	12.1	1.72	0.0883U	12.6	32.4
		GP06-7.5-080516	5-10	16-May-08	190	536	4.72U	0.0037U	0.028	0.0080	0.938U	2.94	5.88	7.38 ²		5.61	5.04	9.1	4.73	0.938U	3.56	13	2.09	-	12.7	13.4	2.82	0.0955U	16	41.4	
		GP06-50-080516	47-53	16-May-08	29.8U	59.6U	4.97U	0.0038U	0.0057U	0.0040U	0.0381U	0.0381U	0.0381U	0.0381U	0.0381U	0.0381U	0.0381U	0.0381U	0.0381U	0.0381U	0.0381U	0.0381U	1.29U	-	14.7	14.4	2.4	0.103U	18.4	46	
		GP06-75-080516	70-75	16-May-08	34.9U	69.8U	4.73U	0.0038U	0.0057U	0.0040U	0.0408U	0.0408U	0.0408U	0.0408U	0.0408U	0.0408U	0.0408U	0.0408U	0.0408U	0.0408U	0.0408U	0.0408U	0.0408U	1.58	-	13.5	12.7	2.06	0.107U	18.9	39.4
		GP06-110-080516	105-110	16-May-08	33.3U	66.6U	5.00U	0.0038U	0.0057U	0.0040U	0.0851U	0.0851U	0.0851U	0.0851U	0.0851U	0.0851U	0.0851U	0.0851U	0.0851U	0.0851U	0.0851U	0.0851U	0.0851U	2.15	-	12.2	14.4	2.16	0.0988U	17.5	41.7
		GP07-05-080522	4-8	22-May-08	34U	68U	4.60U	0.0036U	0.0073	0.0045	0.0363U	0.0363U	0.0363U	0.0363U	0.0363U	0.0363U	0.0363U	0.0363U	0.0363U	0.0363U	0.0363U	0.0363U	0.0363U	3.04	-	18	17.5	3.13	0.107U	20.3	47.5
		GP07-20-080522	18-22	22-May-08	33.9U	115	4.67U	0.0037U	0.0055U	0.0039U	0.338U	0.338U	0.338U	0.338U	0.338U	0.338U	0.338U	0.338U	0.338U	0.338U	0.338U	0.338U	0.338U	3.04	-	19.4	20.2	5.19	0.116	21.3	54.6
		GP07-40-080522	36-40	22-May-08	35.9U	71.7U	4.80U	0.0037U	0.0055U	0.0039U	0.0413U	0.0413U	0.0413U	0.0413U	0.0413U	0.0413U	0.0413U	0.0413U	0.0413U	0.0413U	0.0413U	0.0413U	0.0413U	4.34	-	12.2	13.6	2.81	0.109U	14.7	34.3
		GP08-05-080522	4-8	22-May-08	28.6U	57.1U	4.77U	0.0038U	0.019	0.0040U	0.0393U	0.0393U	0.0393U	0.0393U	0.0393U	0.0393U	0.0393U	0.0393U	0.0393U	0.0393U	0.0393U	0.0393U	0.0393U	2.79	-	21.4	16.7	3.47	0.117U	21.2	48.5
		GP08-20-080522	18-22	22-May-08	32.2U	64.5U	4.72U	0.0038U	0.0094	0.0040U	0.0381U	0.0381U	0.0381U	0.0381U	0.0381U	0.0381U	0.0381U	0.0381U	0.0381U	0.0381U	0.0381U	0.0381U	0.0381U	2.07	-	12.4	13.4	2.25	0.105U	14.9	39.3
		GP08-40-080522	36-40	22-May-08	29.5U	59U	4.78U	0.0037U	0.0055U	0.0039U	0.0362U	0.0362U	0.0362U	0.0362U	0.0362U	0.0362U	0.0362U	0.0362U	0.0362U	0.0362U	0.0362U	0.0362U	0.0362U	1.74	-	12.5	14.9	2.07	0.116U	15.1	39.2
	GP-09	GP09-5-080518	5-8	18-May-08	24.3U	411	4.23U	0.0039U	0.0058U	0.0041U	0.207U	-	1.03U	0.207U	0.207U	1.03U	0.207U	1.03U	0.207U	1.03U	0.207U	0.207U	0.207U	2.38	-	14.1	12.8	2.56	0.117	15.1	43.5
		GP09-50-080518	48-50	18-May-08	30.2U	60.4U	5.02U	0.0037U	0.0055U	0.0039U	0.0441U	0.0441U	0.0441U	0.0441U	0.0441U	0.0441U	0.0441U	0.0441U	0.0441U	0.0441U	0.0441U	0.0441U	0.0441U	1.43U	-	11.2	13.6	1.92	0.115U	15	39.3
		GP09-75-080518	73-75	18-May-08	31.3U	62.6U	4.77U	0.0038U	0.018	0.0047	0.0434U	0.0434U	0.0434U	0.0434U	0.0434U	0.0434U	0.0434U	0.0434U	0.0434U	0.0434U	0.0434U	0.0434U	1.41	-	10.4	12.3	1.89	0.103U	14	36.1	
		GP09-110-080518	108-110	18-May-08	27.6U	55.3U	4.99U	0.0038U	0.0057U	0.0040U	0.0325U	0.0325U	0.0325U	0.0325U	0.0325U	0.0325U	0.0325U	0.0325U	0.0325U	0.0325U	0.0325U	0.0									

Table B-2. URS Grab Groundwater Analytical Results
Shipyard Commerce Center Parking Lot Purchase (units = ug/L)

					NWTPH-Dx								Detected PAHs										Detected Priority Pollutant Total Metals									
					Diesel Range	Heavy Oil Range							NWTPH-Gx Gasoline Range	VOCs	SVOCs	PCBs	TBT Compounds	Benz(a)anthracene	Benzo(a)pyrene	Benzo(b)fluoranthene	Benzo(k)fluoranthene	Benzo(g,h,i)perylene	Chrysene	Fluoranthene	Indeno(1,2,3-cd)pyrene	Naphthalene	Phenanthrene	Pyrene	Arsenic	Beryllium	Chromium	Copper
	Location	Sample ID	Sample Depth (ft)	Date																												
URS Groundwater Results	GP-01	GP01-GW40-080523	36-40	23-May-08	234U	467U	80.0U	< MRLs				0.051	0.0646	0.100 ¹	0.0625	0.0604	0.142	0.0545	0.0381U	0.0728	0.183	3.74	1U	26.4	26.2	3.73	0.1U	62.7	48.7			
	GP-03	GP03-GW40-080523	36-40	23-May-08	238U	476U	80.0U					0.0381U	0.0381U	0.0381U	0.0381U	0.0381U	0.0381U	0.0381U	0.0381U	0.0381U	0.0381U	9.6	1.09	77.7	54.8	8.76	0.1U	59.2	119			
	GP-04	GP04-GW40-080522	36-40	22-May-08	240U	481U	80.0U					0.105	0.141	0.204 ¹	0.153	0.154	0.422	0.128	0.037U	0.304	0.522	8.97	1.66	101	75.9	12.5	0.1U	87.1	165			
	GP-05	GP05-GW40-080522	36-40	22-May-08	238U	476U	80.0U					0.0778	0.104	0.150 ¹	0.11	0.111	0.298	0.0919	0.0381U	0.202	0.367	30.7	1.5	52.9	50	9.79	0.1U	53.1	110			
	GP-07	GP07-GW40-080522	36-40	22-May-08	253U	505U	80.0U					0.0408U	0.0408U	0.0408U	0.0408U	0.0408U	0.0408U	0.0408U	0.0408U	0.0408U	0.0408U	6.38	1U	33.6	27.4	5.01	0.1U	36	67.2			
	GP-08	GP08-GW40-080522	36-40	22-May-08	234U	467U	80.0U					0.0374U	0.0374U	0.0374U	0.0374U	0.0374U	0.0374U	0.0374U	0.0374U	0.0374U	0.0374U	26.1	1.3	55	52.3	9.96	0.1U	56.6	118			
	GP-10	GP10-GW40-080518	36-40	18-May-08	236U	472U	80.0U					0.0392U	0.0392U	0.0392U	0.0392U	0.0392U	0.0392U	0.0392U	0.0392U	0.0392U	0.0392U	9.26	1.43	73.4	67.6	12.4	0.1U	79	249			
	GP-11	GP11-GW40-080518	36-40	18-May-08	236U	472U	80.0U					0.0376U	0.0376U	0.0376U	0.0376U	0.0376U	0.0376U	0.0376U	0.0376U	0.0376U	0.0376U	13.6	1.07	53.5	45.5	8.24	0.112	51.3	108			
	GP-02	GP02-GW110-080517	106-110	17-May-08	236U	472U	80.0U					0.0381U	0.0381U	0.0381U	0.0381U	0.0381U	0.0381U	0.0381U	0.0381U	0.0381U	0.0381U	0.0929	0.0381U	0.0381U	20.4	1U	37	40.4	7.42	0.1U	38.6	157
	GP-06	GP06-GW110-080516	106-110	16-May-08	238U	476U	80.0U					0.0381U	0.0381	0.0762U ¹	0.0392	0.0381U	0.074	0.0381U	0.0381U	0.0494	0.0954	33.8	2.59	221	303	22.3	0.212	167	3730			
GP-09	GP09-GW110-080518	106-110	18-May-08	236U	472U	80.0U	0.0375U	0.0375U	0.0375U	0.0375U	0.0375U	0.0375U	0.0375U	0.0375U	0.0375U	0.0375U	0.0375U	19.1	1U	45.2	43.2	5.13	0.1U	33.6	201							
Human Health Screening Level Values																																
DEQ Groundwater RBCs ²	Ingestion & Inhalation from Tapwater		Occupational		350	-	400	-	-	0.20	-	0.56	0.056	0.56	5.6	-	56	5,800	0.56	25	-	4,400	0.27	290	220,000 ³	5,400	15	44	2,900	-		
	Volatilization to Outdoor Air		Occupational		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-			
	Vapor Intrusion into Buildings		Occupational		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-			
	GW in Excavation		Construction & Exca.		9,700	-	12,000	-	-	1.9	-	9.1	0.53	5.2	49	-	910	9,600	2.9	680	-	5,800	5.8	250	190,000 ³	4,600	-	37	12,000	-		
JSCS Table 3-1: Groundwater / Surface Water (Human Health SLVs) ⁴					-	-	-	-	-	6.40E-05	11	0.0018	0.0018	0.0018	0.0018	0.2	0.0018	0.2	0.0018	0.2	0.2	0.2	0.045	-	100	1,300	15	0.0146	460	2,600		
Ecological Screening Level Values																																
JSCS Table 3-1: Groundwater / Surface Water / Stormwater (Ecological SLVs) ⁴					-	-	-	-	-	0.014	0.072	0.027	0.014	-	-	-	-	-	-	12.0	-	-	3.1	-	-	2.7	0.54	0.012	16	33		

Notes:
ug/L: micrograms per liter
VOCs : volatile organic compounds per EPA 8260B
SVOCs : semi volatile organic compounds per EPA 8270C
PCBs: polychlorinated biphenyls by EPA 8082
TBT: Tributyl Tins by EPA 8270D-Selected Ion Monitoring (SIM)
PAHs: polyaromatic hydrocarbons per EPA 8270-SIM
Total Metals per EPA 6020
MRL: method reporting limit
MRLs listed in data report in Appendix A
U: less than the MRL
- : Data not analyzed or not applicable
Bold font = indicates detected concentrations above the MRL
Boxed values indicates an exceedance of a screening level value (SLV)
1: Peak separation for Benzo(b) and Benzo(k)fluoranthenes does not meet method specified criteria. Reported result includes the combined area of the two isomers and should be considered the total of Benzo(b+k)Fluoranthene
2: DEQ, 2003. Risk-Based Decision Making for the Remediation of Petroleum-Contaminated Sites. September 29.
2: DEQ, 2007. RBCs for Individual Chemicals. Revised RBC Spreadsheet. July 4. <http://www.deq.state.or.us/lq/rbdm.htm>
3: Chromium (III)
4: DEQ, 2007. Portland Harbor Joint Source Control Strategy (JSCS) Document. Table 3-1 (7/16/07 Revision). Most Conservative Screening Level Values (SLVs) for Groundwater / Surface Water / Stormwater Values divided into human health and ecological.



- SUBJECT PROPERTY BOUNDARY
- X-X- FENCING
- GP-03 URS BORING LOCATION
- ⊗ B-7 APPROXIMATE LOCATION OF HISTORICAL BORING

BORING LOCATIONS
SHIPYARD COMMERCE CENTER
PHASE II ESA
PORTLAND, OREGON

JUNE 2008
25696667

FIGURE 3

c:\256966712 Shipyard CC ILL Phase II ESA\1000 Deliverables\CD\Fig 3 Boring Locations.mxd Jun 17, 2008 - 4:27pm

Project: Shipyard Commerce Center Phase II
Project Location: Swan Island, Portland, Oregon
Project Number: 25696712

Log of Boring GP01

Sheet 1 of 1

Date(s) Drilled	5/23/2008	Logged By	Zack Oremland	Checked By	Nicky Moody
Drilling Method	Direct Push	Drill Bit Size/Type		Total Depth of Borehole	40.0 feet
Drill Rig Type	9500 VTR Power Probe	Drilling Contractor	Pacific Soil and Water, LLC	Approximate Surface Elevation	Not Measured
Groundwater Level and Date Measured	18 feet bgs	Sampling Method(s)	2x5 Macrocore	Hammer Data	N/A
Borehole Backfill	Bentonite Chips	Location			

Elevation, feet	Depth, feet	SAMPLES				Graphic Log	MATERIAL DESCRIPTION	REMARKS
		Type	Number	Recovery, %	Headspace PID, ppm			
0							6" Asphalt over 6" gravel sub-base with medium to coarse sand. SILTY CLAY [ML-CL], grey brown, dry, low plasticity, layered.	
			1					
							SILT [ML], grey, wet POORLY GRADED SAND [SP], brown, moist, medium grained.	GP-01-05-080523 Sample Depth = 4'-8' Sample Time = 0842
			2					
10							SILT [ML], silt layer	
			3				LEAN CLAY [CL], dark grey POORLY GRADED SAND [SP], dark grey, medium grained, moist.	
							Changes to brown, wet	
			4				Changes to dark grey	
20								
			5				SILT [ML], with organics, wet LEAN CLAY [CL], olive grey, wet	GP-01-20-080523 Sample Depth = 18'-22' Sample Time = 0901
			6					
30							SILT [ML], olive green, wet	
			7				SILTY SAND [SM], wet, fined grained	
							LEAN CLAY [CL], brown, wet POORLY GRADED SAND [SP], brown to black, medium grained, wet	
			8					GP-01-40-080523 Sample Depth = 36'-40' Sample Time = 0931
40							Terminated at 40-feet bgs and backfilled with bentonite chips on 5/23/2008.	
50								

Project: Shipyard Commerce Center Phase II
Project Location: Swan Island, Portland, Oregon
Project Number: 25696712

Log of Boring GP02

Sheet 1 of 2

Date(s) Drilled	5/17/2008	Logged By	Nicky Moody	Checked By	Brian Pletcher
Drilling Method	Direct Push	Drill Bit Size/Type		Total Depth of Borehole	110.0 feet
Drill Rig Type	9500 VTR Power Probe	Drilling Contractor	Pacific Soil and Water, LLC	Approximate Surface Elevation	Not Measured
Groundwater Level and Date Measured	18 feet bgs	Sampling Method(s)	2x5 Macrocore	Hammer Data	N/A
Borehole Backfill	Bentonite Grout	Location			

Elevation, feet	Depth, feet	SAMPLES				Graphic Log	MATERIAL DESCRIPTION	REMARKS
		Type	Number	Recovery, %	Headspace PID, ppm			
0							6" Asphalt over 6" gravel sub-base with medium to coarse sand.	
			1	95			SILT [ML], olive grey, moist, non plastic, no odor, no sheen.	
					0		POORLY GRADED SAND [SP], dark brown to brownish yellow, moist to dry, loose to medium dense, medium to coarse sand, no odor, no sheen.	GP02-05-080517 Sample Depth = 4'-5' Sample Time = 0800
			2	90			Grades to medium grained sand.	
10					0			
			3	80			Fine gravel encountered.	
					0		Grades to trace fine gravel.	
			4	100			1-inch seam of dark olive to gray clay, medium stiff	
20					0			
			5	95			LEAN CLAY [CL], dark grey, medium plasticity, wet, medium stiff, with some silt, no odor, no sheen.	
					0		POORLY GRADED SAND [SP], dark gray, wet, medium grained, no odor, no sheen.	
			6	95			LEAN CLAY [CL], dark grey, wet, medium stiff, medium plasticity, no odor, no sheen.	
30					0			
			7	95			SILT [ML], olive gray, moist.	
					0		POORLY GRADED SAND [SP], dark gray, wet, medium grained, no odor, no sheen.	
			8	95				
40					0		Grades to black.	
			9	90			Grades to medium ot coarse grained.	
					0			
			10	95				
50					0			
			11	95			Grades medium grained.	GP02-50-080517 Sample Depth = 50'-52' Sample Time = 0950

Project: Shipyard Commerce Center Phase II
Project Location: Swan Island, Portland, Oregon
Project Number: 25696712

Log of Boring GP02

Sheet 2 of 2

Elevation, feet	Depth, feet	SAMPLES				Graphic Log	MATERIAL DESCRIPTION	REMARKS
		Type	Number	Recovery, %	Headspace PID, ppm			
			12	95	0		POORLY GRADED SAND [SP] , dark gray, wet, medium grained, no odor, no sheen.	Sampler jammed, 60-65 feet.
60			13	0	0			
			14	50	0			
70			15	86	0			
			16	90	0		Same as Above	GP02-75-080517 Sample Depth = 73'-75' Sample Time = 1055 80 to 105 feet, no samples collected.
80								
90								
100							Boring terminated at 110 feet bgs and backfilled with cement bentonite grout upon completion on 5/17/2008.	GP02-110-080517 Sample Depth = 108'-110' Sample Time = 1220
110			17	80	0			

Project: Shipyard Commerce Center Phase II
Project Location: Swan Island, Portland, Oregon
Project Number: 25696712

Log of Boring GP03

Sheet 1 of 3

Date(s) Drilled	5/23/2008	Logged By	Zack Oremland	Checked By	Nicky Moody
Drilling Method	Direct Push	Drill Bit Size/Type		Total Depth of Borehole	40.0 feet
Drill Rig Type	9500 VTR Power Probe	Drilling Contractor	Pacific Soil and Water, LLC	Approximate Surface Elevation	Not Measured
Groundwater Level and Date Measured	18 feet bgs	Sampling Method(s)	2x5 Macrocore	Hammer Data	N/A
Borehole Backfill	Bentonite Chips	Location			

Elevation, feet	Depth, feet	SAMPLES				Graphic Log	MATERIAL DESCRIPTION	REMARKS
		Type	Number	Recovery, %	Headspace PID, ppm			
0							6" Asphalt over 6" gravel sub-base with medium to coarse sand.	
			1				SILTY CLAY [CL-ML] , grey, dry, soft, interbedded silt and clay.	
			2				POORLY GRADED SAND [SP] , dark brown to dark grey, dry, coarse grained.	GP03-05-080523 Sample Depth = 4'-8" Sample Time = 1032
10			3					
			4					
20			5				Soil becomes wet at 19-feet SILTY CLAY [ML] , grey to olive, dry, soft, interbedded silt and clay.	GP03-20-080523 Sample Depth = 18'-22" Sample Time = 1040
			6				Less silt LEAN CLAY [CL] , brown, high plasticity, wet	
30			7				At 28 feet thin layer of highly plastic silt noted Less plastic, higher silt content noted	
			8				POORLY GRADED SAND [SP] , dark brown to brown black, dry, coarse grained. Color change to dark brown, medium grained, wet Color change to black	GP03-40-080523 Sample Depth = 36'-40" Sample Time = 1058
40							Geoprobe driven to 157 feet, no samples taken	
50								

Project: Shipyard Commerce Center Phase II
Project Location: Swan Island, Portland, Oregon
Project Number: 25696712

Log of Boring GP03

Sheet 2 of 3

Elevation, feet	Depth, feet	SAMPLES				Graphic Log	MATERIAL DESCRIPTION	REMARKS
		Type	Number	Recovery, %	Headspace PID, ppm			
	60							
	70							
	80							
	90							
	100							
	110							

Project: Shipyard Commerce Center Phase II
Project Location: Swan Island, Portland, Oregon
Project Number: 25696712

Log of Boring GP06

Sheet 1 of 2

Date(s) Drilled	5/22/2008	Logged By	Zack Oremland	Checked By	Nicky Moody
Drilling Method	Direct Push	Drill Bit Size/Type		Total Depth of Borehole	110.0 feet
Drill Rig Type	9500 VTR Power Probe	Drilling Contractor	Pacific Soil and Water, LLC	Approximate Surface Elevation	Not Measured
Groundwater Level and Date Measured	16 feet bgs	Sampling Method(s)	2x5 Macrocore	Hammer Data	N/A
Borehole Backfill	Bentonite Grout	Location			

Elevation, feet	Depth, feet	SAMPLES				Graphic Log	MATERIAL DESCRIPTION	REMARKS
		Type	Number	Recovery, %	Headspace PID, ppm			
0							6" Asphalt over 6" gravel sub-base with medium to coarse sand. SILTY CLAY [CL-ML] , grey brown, dry, no odor, no sheen.	
	1							
	2						POORLY GRADED SAND [SP] , Dark brown to black, moist to dry, loose to medium dense, medium grained.	GP06-05-080522 Sample Depth = 5'-10' Sample Time = 0810
10							<i>A thin layer of fine gravels noted</i>	
	3							
	4						LEAN CLAY [CL] , dark grey, wet, with some silt, no odor, no sheen. POORLY GRADED SAND [SP] , dark grey, moist, loose to dense, some silt.	
20							<i>Grades to brown, wet, no silt</i>	
	5							
	6						LEAN CLAY [CL] , grey, very soft, wet, with some silt, no odor, no sheen. <i>Wood chips encountered</i>	
30							POORLY GRADED SAND [SP] , brown, wet, medium grained, some silt.	
	7							
	8							
40							<i>Changes to black</i>	
	9							
	10						<i>Wood debris encountered</i>	
50							<i>Wood debris encountered</i>	
	11							GP06-50-080522 Sample Depth = 47'-53' Sample Time = 0915

Project: Shipyard Commerce Center Phase II
Project Location: Swan Island, Portland, Oregon
Project Number: 25696712

Log of Boring GP06

Sheet 2 of 2

Elevation, feet	Depth, feet	SAMPLES				Graphic Log	MATERIAL DESCRIPTION	REMARKS
		Type	Number	Recovery, %	Headspace PID, ppm			
			12				POORLY GRADED SAND [SP], black, wet, medium grained, some silt.	
	60		13					
			14				Some fine gravels encountered, well rounded	
	70		15					
			16					GP06-75-080522 Sample Depth = 70'-75' Sample Time = 1050
	80		17					
			18					
	90		19					
			20					
	100		21					
			22					
	110						Wood debris encountered	GP06-110-080522 Sample Depth = 106'-110' Sample Time = 1420
							Boring terminated at 110-feet bgs and backfilled with cement bentonite grout on 5/22/2008.	

Project: Shipyard Commerce Center Phase II
Project Location: Swan Island, Portland, Oregon
Project Number: 25696712

Log of Boring GP08

Sheet 1 of 1

Date(s) Drilled	5/15/2008	Logged By	Zack Oremland	Checked By	Nicky Moody
Drilling Method	Direct Push	Drill Bit Size/Type		Total Depth of Borehole	40.0 feet
Drill Rig Type	9500 VTR Power Probe	Drilling Contractor	Pacific Soil and Water, LLC	Approximate Surface Elevation	Not Measured
Groundwater Level and Date Measured	18 feet bgs	Sampling Method(s)	2x5 Macrocore	Hammer Data	N/A
Borehole Backfill	Bentonite Chips	Location			

Elevation, feet	Depth, feet	SAMPLES				Graphic Log	MATERIAL DESCRIPTION	REMARKS
		Type	Number	Recovery, %	Headspace PID, ppm			
0							6" Asphalt over 6" gravel sub-base with medium to coarse sand.	
			1				SILTY CLAY [CL-ML] , grey, low plasticity, dry, interbedded with brown sand, no odor, no sheen.	
							POORLY GRADED SAND [SP] , brown, dry, medium grained.	GP08-05-080522 Sample Depth = 4'-8'
			2				<i>Thin silt layer encountered</i>	Sample Time = 0832
10							<i>Grades to moist</i>	
			3				LEAN CLAY [CL] , brown, moist, with rounded to well rounded fine gravels.	
			4				<i>wet</i>	
20							POORLY GRADED SAND [SP] , grey to black, wet, loose to dense, medium grained.	GP08-20-080522 Sample Depth = 18'-20'
			5				LEAN CLAY [CL] , olive grey, highly plastic, wet, no odor, no sheen.	Sample Time = 0850
			6					
30								
			7				POORLY GRADED SAND [SP] , dark brown, wet, medium grained, with coarse interbedded silt.	
			8					GP08-40-080522 Sample Depth = 36'-40'
40							Boring terminated at 40-feet bgs and backfilled with bentonite chips on 5/15/2008.	Sample Time = 0920
50								

Project: Shipyard Commerce Center Phase II
Project Location: Swan Island, Portland, Oregon
Project Number: 25696712

Log of Boring GP09

Sheet 1 of 2

Date(s) Drilled	5/18/2008	Logged By	Nicky Moody	Checked By	Brian Pletcher
Drilling Method	Direct Push	Drill Bit Size/Type		Total Depth of Borehole	110.0 feet
Drill Rig Type	9500 VTR Power Probe	Drilling Contractor	Pacific Soil and Water, LLC	Approximate Surface Elevation	Not
Groundwater Level and Date Measured	19 feet bgs	Sampling Method(s)	2x5 Macrocore	Hammer Data	N/A
Borehole Backfill	Bentonite Grout	Location			

Elevation, feet	Depth, feet	SAMPLES				Graphic Log	MATERIAL DESCRIPTION	REMARKS
		Type	Number	Recovery, %	Headspace PID, ppm			
0							6" Asphalt over 6" gravel sub-base with medium to coarse sand.	
			1	0			POORLY GRADED SAND [SP], brown yellow, dry, medium grained, loose, no odor, no sheen.	
			2	20	0			GP09-05-080518 Sample Depth = 5'-8' Sample Time = 0800
10								
			3	95	0			
			4	95	0			
20							LEAN CLAY [CL], loive grey, medium plasticity, no odor, no sheen.	
			5	80	0		CLAYEY SAND [SC], olive grey, wet, fine grained, no odor, no sheen.	
							SILTY SAND [SM], brown, wet, loose to dense.	
			6	100	0		POORLY GRADED SAND [SP], brown, wet, fined to medium grained, with clay, loose to dense.	
30							LEAN CLAY [CL], grey, non plastic, wet, no odor, no sheen.	
			7	100	0		CLAYEY SAND [SC], dark brown, wet, no odor, no sheen.	
							POORLY GRADED SAND [SP], dark brown, wet, medium grained, loose to dense.	
			8	100	0			
40								
			9	0	0			
			10	80	0			
50								
			11	0	0			GP09-50-080518 Sample Depth = 48'-50' Sample Time = 0845

Project: Shipyard Commerce Center Phase II
Project Location: Swan Island, Portland, Oregon
Project Number: 25696712

Log of Boring GP09

Sheet 2 of 2

Elevation, feet	Depth, feet	SAMPLES				Graphic Log	MATERIAL DESCRIPTION	REMARKS
		Type	Number	Recovery, %	Headspace PID, ppm			
	60						POORLY GRADED SAND [SP], black, wet, medium grained, loose to dense.	No samples collected for 50 to 70 feet
	70							
	80				0			GP09-75-080518 Sample Depth = 73'-75' Sample Time = 0915
	90							
	100		12	75	0			GP09-110-080518 Sample Depth = 108'-110' Sample Time = 1040
	110						Boring terminated at 110-feet bgs and backfilled with cement bentonite grout on 5/18/2008.	

Sheet 1 of 1

Date(s) Drilled	5/18/2008	Logged By	Nicky Moody	Checked By	Brian Pletcher
Drilling Method	Direct Push	Drill Bit Size/Type		Total Depth of Borehole	40.0 feet
Drill Rig Type	9500 VTR Power Probe	Drilling Contractor	Pacific Soil and Water, LLC	Approximate Surface Elevation	Not
Groundwater Level and Date Measured	19 feet bgs	Sampling Method(s)	2x5 Macrocore	Hammer Data	N/A
Borehole Backfill	Bentonite Chips	Location			

Elevation, feet	Depth, feet	SAMPLES				Graphic Log	MATERIAL DESCRIPTION	REMARKS
		Type	Number	Recovery, %	Headspace PID, ppm			
	0						6" Asphalt over 6" gravel sub-base with medium to coarse sand.	
	1						POORLY GRADED SAND [SP], dark brown to brownish yellow, dry to moist, medium grained.	
	2						SILTY [ML], olive grey, non plastic, moist, no odor, no sheen.	GP10-05-080518 Sample Depth = 3'-5' Sample Time = 1335
	3						POORLY GRADED SAND [SP], dark brown to brownish yellow, dry to moist, medium grained.	
	4						Grades to dark grey	
	5						LEAN CLAY [CL], olive grey to dark grey, moist to wet, medium plastic, dry, no odor, no sheen.	
	6						POORLY GRADED SAND [SC], dark grey, wet, with silt and clay, no odor or sheen, sand with clay	
	7						SILTY CLAY [CL-ML], olive grey to dark grey, moist to wet, medium plastic, dry, no odor, no sheen.	
	8						POORLY GRADED SAND [SP-SC], dark grey, wet, with clay, no odor or sheen	
	9						POORLY GRADED SAND [SP], dark brown, medium sand, wet	
	10							GP10-20-080518 Sample Depth = 17'-19' Sample Time = 1345
	11							
	12							
	13							
	14							
	15							
	16							
	17							
	18							
	19							
	20							
	21							
	22							
	23							
	24							
	25							
	26							
	27							
	28							
	29							
	30							
	31							
	32							
	33							
	34							
	35							
	36							
	37							
	38							
	39							
	40						Boring terminated at 40-feet bgs and backfilled with cement bentonite chips.	GP10-40-080518 Sample Depth = 38'-40' Sample Time = 1405
	41							
	42							
	43							
	44							
	45							
	46							
	47							
	48							
	49							
	50							

Attachment C

Laboratory Analytical Reports (CD-Rom)

Attachment D

DEQ Data Reporting and Screening Tables (CD-Rom)

Attachment E

Cascade DEQ June 27, 2008 Letter Amendment



Oregon

Theodore Kulongoski, Governor

Department of Environmental Quality

Northwest Region Portland Office

2020 SW 4th Avenue, Suite 400

Portland, OR 97201-4987

(503) 229-5263

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June 27, 2008

T. Alan Sprott
Director of Environmental Services
Cascade General, Inc.
5555 North Channel Ave., Ste 400
Portland, Oregon 97203

SUBJECT: Amendment to Letter Agreement
Cascade General Ship Repair Yard
ECSI #271

Dear Mr. Sprott:

This letter serves as an amendment to the May 8, 2006 Letter Agreement (2006 Agreement) between the Department of Environmental Quality (DEQ) and Vigor Industrial, LLC regarding DEQ review and oversight of an expanded preliminary assessment addressing potential impacts to the Willamette River from stormwater discharge at the Portland Shipyard.

This amendment expands the area addressed by the 2006 Agreement to include an adjacent 7.83 acre parcel located southwest of North Channel Avenue on Swan Island, Portland, OR ("adjacent parcel"). The adjacent parcel is bounded to the northeast by N. Channel Avenue, to the northwest by the Swan Island Shipyard property covered by the original Letter Agreement, and to the southwest and southeast by Port of Portland property. Its location is shown on the attached figure. The scope and focus of the assessment on the adjacent parcel will be the same as that being conducted at the Portland Shipyard under the 2006 Agreement (i.e., the assessment will focus on potential contaminant transport to the Willamette River via stormwater as of the date the adjacent parcel is transferred to Vigor Industrial by the Port of Portland).

DEQ and Vigor agree that DEQ project costs associated with oversight of work on the adjacent parcel will be applied to the existing account established for Vigor Industrial for the Portland Shipyard site under the 2006 Agreement.

The intent of this amendment is to incorporate the adjacent parcel within the scope of the 2006 Agreement upon transfer of that parcel to Vigor Industrial by the Port of Portland and to clarify that payment of DEQ costs associated with the stormwater

assessment on the adjacent parcel will be made through the existing account. All other terms of the 2006 Agreement remain unchanged and by this amendment are equally applicable to the adjacent parcel.

DEQ appreciates Vigor Industrial's continued interest in the Voluntary Cleanup Program and looks forward to working with you.

Sincerely,



Keith Johnson, Manager
Lower Willamette Section
DEQ NWR

If the terms of this Amendment are acceptable to you, please have it executed by an authorized representative in the space provided below and returned to us.

Accepted and agreed to this 27 day of JUNE, 2008.

By T. Am. J. W.

Title: VP

